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December 15, 2017

Ex-Parte To be filed partially under seal

Honorable Vernon S. Broderick United States District Judge Southern District of New York United States Courthouse 40 Centre Street - Room 415 New York NY 10007

Re: United States v. Sayfullo Habibullaevic Saipov 17 Cr. 0722 (VSB)

Dear Judge Broderick:

As set forth in our ex-parte letter dated December 13, 2017, the defense has identified a number of experts, with whom we intend to consult and potentially retain. In connection with these potential defense experts, the defense requests an order prohibiting the government from seeking access to Mr. Saipov's visitor log.



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For this reason, we ask the Court to sign the enclosed order precluding the Government from seeking access to Mr. Saipov's visitor log, which is maintained by BOP staff at MCC New York. I ask that the second and third paragraphs of this letter remain ex-parte and under seal because they reference defense planning and strategy.

Respectfully submitted,

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